

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK)

**DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF
PLAINTIFF E. JEAN CARROLL'S MEMORANDUM OF LAW
IN OPPOSITION TO DEFENDANT DONALD J. TRUMP'S
RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW**

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's memorandum of law in opposition to Defendant Donald J. Trump's renewed motion for judgment as a matter of law.

3. Attached hereto as **Exhibit 1** is true and correct copy of excerpts from the official transcript of the trial in this action.

4. Attached hereto as **Exhibit 2** is a true and correct copy of PX-1, which was entered into evidence during the trial in this action.

5. Attached hereto as **Exhibit 3** is a true and correct copy of PX-2, which was entered into evidence during the trial in this action.

6. Attached hereto as **Exhibit 4** is a true and correct copy of PX-3, which was entered into evidence during the trial in this action.

7. Attached hereto as **Exhibit 5** is a true and correct copy of PX-4, which was entered into evidence during the trial in this action.

8. Attached hereto as **Exhibit 6** is a true and correct copy of PX-40, which was entered into evidence during the trial in this action.

9. Attached hereto as **Exhibit 7** is a true and correct copy of PX-45, which was entered into evidence during the trial in this action.

10. Attached hereto as **Exhibit 8** is a true and correct copy of PX-59, which was entered into evidence during the trial in this action.

11. Attached hereto as **Exhibit 9** is a true and correct copy of PX-66, which was entered into evidence during the trial in this action.

12. Attached hereto as **Exhibit 10** is a true and correct copy of PX-71, which was entered into evidence during the trial in this action.

13. Attached hereto as **Exhibit 11** is a true and correct copy of PX-85, which was entered into evidence during the trial in this action.

14. Attached hereto as **Exhibit 12** is a true and correct copy of PX-114, which was entered into evidence during the trial in this action.

15. Attached hereto as **Exhibit 13** is a true and correct copy of PX-118, which was entered into evidence during the trial in this action.

16. Attached hereto as **Exhibit 14** is a true and correct copy of PX-122, which was entered into evidence during the trial in this action.

17. Attached hereto as **Exhibit 15** is a true and correct copy of PX-124, which was entered into evidence during the trial in this action.

18. Attached hereto as **Exhibit 16** is a true and correct copy of PX-128, which was entered into evidence during the trial in this action.

19. Attached hereto as **Exhibit 17** is a true and correct copy of PX-130, which was entered into evidence during the trial in this action.

20. Attached hereto as **Exhibit 18** is a true and correct copy of PX-132, which was entered into evidence during the trial in this action.

21. Attached hereto as **Exhibit 19** is a true and correct copy of PX-149-T, which was entered into evidence during the trial in this action.

22. Attached hereto as **Exhibit 20** is a true and correct copy of PX-152, which was entered into evidence during the trial in this action.

23. Attached hereto as **Exhibit 21** is a true and correct copy of PX-160, which was entered into evidence during the trial in this action.


24. Attached hereto as **Exhibit 22** is a true and correct copy of PX-164-T, which was entered into evidence during the trial in this action.

25. Attached hereto as **Exhibit 23** is a true and correct copy of PX-165, which was entered into evidence during the trial in this action.

26. Attached hereto as **Exhibit 24** is a true and correct copy of PX-166, which was entered into evidence during the trial in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 26, 2024



Roberta A. Kaplan